

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARNE H. FREDLY,
HENG REN SILK ROAD INVESTMENTS
LLC, HENG REN INVESTMENTS LP,
derivatively on behalf of SINO AGRO FOOD,
INC.,

Plaintiffs,

v.

SINO AGRO FOOD, INC., LEE YIP KUN
SOLOMON, TAN POAY TEIK, CHEN BOR
HANN, LIM CHANG SOH.,

Defendants,

and

SINO AGRO FOOD, INC.,

Nominal Defendant

Case No. 19-cv-02680 (JMF)

**PLAINTIFFS' NOTICE OF
MOTION AND UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF DERIVATIVE
SETTLEMENT**

To: ALL PARTIES AND THEIR ATTORNEYS OF RECORD


PLEASE TAKE NOTICE THAT, Plaintiffs, by and through their counsel, hereby move the Court, before the Honorable Jesse M. Furman, United States District Court Judge for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Court Room 1105, New York, NY 10007, for entry of the [Proposed] Order Preliminarily Approving Derivative Settlement and Providing for Notice, agreed upon by all parties: (1) granting preliminary approval of the Settlement set forth in the proposed settlement agreement dated June 27, 2020 ("Proposed Settlement"), and filed contemporaneously as Exhibit A to the accompanying Declaration of Angus Ni, (2) approving of the form and manner for giving notice of the Settlement,

which is attached as Exhibit C to the accompanying Declaration of Angus Ni, and (3) setting a hearing date for final approval, and a schedule for various deadlines relevant to final approval.

This Motion is based this Notice of Motion, the following Memorandum of Points and Authorities, the accompanying Declaration of Angus Ni and exhibits thereto, the Declarations of Messrs. Peter Halesworth and Arne Fredly, the Declaration of Professor Daniel J. Morrissey, as well as the record in this action, and such other matters and argument as may be presented to the Court.

Dated: July 15, 2020

AFN LAW PLLC

By: _____

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Richard Babnick RBabnick@SRF.LAW

Attorney for Defendants

By: /s/ Angus F. Ni
Angus F. Ni